

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

City of Richmond Division

Promila Rajput

Case No. 3:21cv00549

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

1. In re Pet Circuit Ct Richd, 2. In re Pet Gen Dst Ct Richd, 3. Samuel Towell Dy AG, 4. In re: Pet Gen Dst Ct Henrico, 5. In re: Pet.Circuit Ct Frederick, 6. In re: Pet Gen Dist Ct Arlington

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Promila Rajput
Street Address	3404 S Street
City and County	Richmond
State and Zip Code	Virginia 23223
Telephone Number	804 968 9026
E-mail Address	promila.rajput.11@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	In re: Petitioner, 3rd floor, Circuit Court
Job or Title <i>(if known)</i>	Presiding Judge
Street Address	400 North, 9th Street
City and County	City of Richmond
State and Zip Code	Virginia 23219
Telephone Number	804 646 6514
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	In re: Petitioner, 2nd floor, General District Court
Job or Title <i>(if known)</i>	Presiding Judge
Street Address	400 North, 9th Street
City and County	City of Richmond
State and Zip Code	Virginia 23219
Telephone Number	804 646 6461
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Samuel T. Towell
Job or Title <i>(if known)</i>	Deputy Attorney General for Civil Litigation
Street Address	202 North, 9th Street
City and County	City of Richmond
State and Zip Code	Virginia 23219
Telephone Number	804 784 2071
E-mail Address <i>(if known)</i>	STowell@oag.state.va.us

Defendant No. 4

Name	In re: Petitioner,
Job or Title <i>(if known)</i>	Presiding Judge, General District Court
Street Address	4309 East Parham Road
City and County	Henrico
State and Zip Code	Virginia 23273
Telephone Number	804 501 4727
E-mail Address <i>(if known)</i>	

**Defendant list
Continued**

Defendant No. 5

Name	In re: Petitioner
Job or Title (<i>if known</i>)	Presiding Judge, Circuit Court
Street Address	701 Princess Anne Street, Suite 100
City and County	City of Fredericksburg
State and Zip Code	Virginia 22401
Telephone Number	540 372 1066

Defendant No. 6

Name	In re: Petitioner
Job or Title (<i>if known</i>)	Presiding Judge, General District Court
Street Address	1425 North Courthouse Road, Suite 2400, 2nd Floor
City and County	Arlington County
State and Zip Code	Virginia 22201
Telephone Number	703 228 7900

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1. 18USC Section 241 Conspiracy Against Rights
2. 18USC Section 242 Deprivation of Rights Under Color of Law

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. On July 19, 2019 from district court, and on August 23, 2019 from circuit court, I received two separate orders placing pre-filing injunction imposing a litany of papers to maliciously harass me, causing me financial, physical pain, character, and legal injury to me, invalidate my claims to deter me, with a motive to cover up serious crimes of varied nature of organized racketeering fraud by individuals getting legal favors without validity, acting beyond the bounds of their responsibilities, failing in the performance of their unalienated legal duties towards me.
2. Henrico County order was never given to me. 3. Pattern in all pre-filing injunction orders is same, depriving legal remedy to me ONLY by depriving mandatory discovery, which are two serious federal questions. Continued.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

- A. The following defective orders concealing RICO activity be nullified, vacated or dissolved:-
 1. 8/23/19 amended on 9/3/19 by deleting clause asking stay on discovery, entered by Hon. Judge Jenkins, City of Richmond Circuit Court.
 2. 7/18/19 entered by Hon. Judge L.B. Cann III, Richmond City Gen. District Court, demanded by AG's office.
 3. 4/4/16 entered by Hon. Judge George Barton Chuckers, Henrico County General District Court.
 4. 7/20/15 entered by Hon. Judge Herbert M. Hewitt, City of Fredericksburg Circuit Court.
 5. 2/6/12 entered by Retired Hon. Judge Karen Hanenberg, Arlington County General District Court.

OR,
those awarded injunctions prove their legal standing, law violated, cause of action, and produce mandatory disclosures with supporting evidence.

B. Mr. Samuel Towell, Deputy Attorney General and any of his participating partner(s) known only to Mr. Towell in the Civil Litigation Department in the Office of The Attorney General of Virginia be held responsible, and face consequences by the law, as I or anyone else would.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 8/24/21

Signature of Plaintiff

Printed Name of Plaintiff

Promila Rajput

Promila Rajput

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Not Applicable

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Complaint

Continued from Page 4

Section III Statement of Claim

1. **Joinder** - The Attorney General's office is included in this lawsuit because the court cannot accord complete relief without the presence of additional parties who have directly impeded the process.
2. **Statute of Limitation** - This claim is not time-barred for reasons : (a) concealing identities, (b) failure to produce mandatory evidence, (c) failure to produce mandatory exculpatory evidence, (d) failure to produce mandatory disclosures relating to legal standing, (e) failure to produce law violated, and (f) failure to state any cause of action for injunctive relief.
3. **Failure to resolve** - I gathered info, tried to work things out directly, with other agencies, and alternative dispute resolution, but I faced vicious verbal and physical hostility charging up to my face and circling me, diatribes, indecent racial insults, and threats to my and my son's physical safety. As evidence shows and verifies that I have exhausted all remedies before I now properly pursue a claim in this court because time and again influence is exceeding duty.
4. **Legal Basis** - I have legal rights involving remedy against anyone who acts in a manner that subjects me and my family to harm by wrongs done to me as a result of breach of duty to deprive me due process, and actions taken that continue to deprive me of due process under color of law, and conspiracy against my privilege, because I participate in privilege provided by court system of local government. Law prohibits judges and attorneys to exploit unrepresented parties. But I am passionately exploited.

5. Misconduct as they occurred

5.1. Arlington's February 6, 2012 order - Entered by Judge Karen Hanenberg (now retired) in Page 3 unnumbered para 3 blackmails me for money, re-affirms blackmail fraud in last para, or be subjected to dismissal of RICO related serious misconduct of threatening to break legs, alienating affection, withholding any minimal human contact, kidnapping, trafficking, indecent sexual liberties by willful false court documents and making up false narratives. Page 4 second last para states that the paid cases receive due process, by clubbing with unpaid cases. Page 5 point (c) demands money from me for future filings. Clearly the county attorney, attorney general's office, and judge conspired and favored each other to create the order on the pretext of money ONLY for ongoing RICO activity, a reason invalid to deprive me of legal remedy. As a result of the inactions and interference wilfully caused by participation of the judge, attorney general's civil litigation department, and county attorney's office to address my claims seriously, I suffer the consequences of the wrongs to date in all areas of life, by injuries to my personal legal interests that are irreparable and irrecoverable, nurturing the family, time I lost with family. If officials acted responsibly, followed the law, allowed due process of at least the paid claims, and allowed the appeal process, we would not continue to suffer the losses, our entire lives destroyed by their reckless negligence. When a person is a repeat offender, new cases are filed as offense occurs, no pre-filing injunction is placed, but I was subject to a different treatment to cover up wrongs. Appeal was denied by Judge Newman of Circuit because Judge Hanenberg wrote so in her handwriting influencing circuit.

- 5.2. **Fredericksburg's July 20, 2015 order** - Page 1 Para 2 is falsified because Kenneth Condrey, the private processor, never drove from Chesterfield to Fredericksburg to serve me, and never entered the court building as that day's surveillance captured. The proof of service was falsified and filed in court by UMFS's fraud attorney Steven Brown, whose name does not appear on page 2 because a police report was filed against Mr. Brown for trespassing upon my residence and was abusive and disruptive with my landlord there. That court found the fact that service was not made; yet they falsified the order just because they can, extracted by unauthorized UMFS by fraud. The Plaintiff, UMFS, did not state nor produce any legal standing, law violated, or cause of action, mandatory disclosures. All cases closed on 1/7/2014 in Arlington. We reunited on December 30, 2014 in Extended Stay on Glenside Drive in Henrico. UMFS had no jurisdiction over me or my family at all for any reason whatsoever but influenced upon the judge. UMFS stalked and pursued me to Fredericksburg, maliciously harassed, interfered and damaged my personal legal rights. As a result the judge maliciously harassed, distressed me, and maliciously damaged my legal privilege that this court sees the imminent damage, beyond the bounds of duty.
- 5.3. **Henrico's April 4, 2016 order** - I have no knowledge of how or when this order was entered. Whoever petitioned did not serve me the petition, nor the order was served, nor I was informed when the order was entered or immediately soon thereafter, nor was it ever filed. I have a right to receive a petition, submit my response and get legal standing, cause of action, law violated, evidence, identity of the petitioner, and related mandatory disclosures. The judge wilfully deprived me of all such protected process

and procedure, gave favor and emboldened the miscreants, as a result maliciously harassed me irremediably and irreparably damaging my legal interest and character, for imminent harm, subjecting me to different punishment, and penalty by acting beyond the bounds of their official duty despite being bound by law, and duty to protect my legal right.

- 5.4. General District Court City of Richmond's July 18, 2019 order** - The pattern follows. I was shocked at the appearance at my house of the Sheriff's deputy to serve me this order. I asked for discovery, the clerk viciously denied by extracting an illegal ex-parte order on July 19, 2019 from Hon Judge Thorne-Begland. Hon. Judge Cann, who entered this order on 7/18/19 told me on 3rd September 2019 that (a) he will dissolve the order but later changed his mind, and (b) that the Attorney General's office asked him to enter the order, but did not state the name. This proves that Mr. Towell as head of the department is fully involved and participated in extracting the 7/18/19 order by fraud making a back door entry depriving me of petition, legal standing, cause of action, law violated, my response, exculpatory evidence, and relative disclosures. In the City of Richmond courts, my former employer Ronald Irving Fogg has 68 cases, all of which were dismissed but one, but no pre-filing injunction was entered. Imposing different punishments upon me involving physical, character, and monetary injuries, proves exploitation of and bias towards me being an alien, constituting hate crime. Hon Judge Cann was duty bound towards me to protect my legal right of due process in the performance of his official duties, he affords to others, but failed and maliciously harassed, caused distress, damaged my legal interest

and character, giving favor to the attorney general's office cannot be any clear. Such acts of conspiracy against my rights, and deprivation of my right under color of law, directly point to Mr. Samuel Towell who is deputy attorney general in the civil litigation department and the Hon. Judge Cann who wilfully participated in depriving my privileges that (a) are secured by law because such privileges are provided by the court system of the local government.

5.5. Circuit Court City of Richmond's August 23rd, 2019 order amended on 9/3/19 -

Hon. Judge Jenkins lacked jurisdiction due conflict to enter this order in CL-19-3514 Promila Rajput v Tiffany Terrell (a deputy clerk at the public counter of the general district court who violated my privilege to file a claim against my employer for tortuous termination due to interference of RICO racket, without authority. Judge was duty bound and obligated to disqualify himself and forward for a designated judge from the Supreme Court of Virginia. Other two circuit judges Hon Judge Rupe and Hon Judge Hairston at par with Hon Judge Jenkins disqualified themselves; likewise Hon Judge Jenkins was obligated and duty bound to disqualify himself and was unauthorized by Virginia Code, but did not. Furthermore, the judge failed to apply such administrative laws, and laws relating to important threshold factors of legal standing of Terrell and Hensley (assistant attorney general representing Terrell), cause of action, exculpatory evidence, and mandatory disclosures. For this reason, knowing disclosures are mandatory, the judge amended the order on 9/3/19 by deleting the handwritten clause where Ms. Hensley is asking for a stay on discovery. This means the stay on discovery was denied. This means that discovery was and remains pending

and thus no statute of limitation is applicable until discovery is produced. Most importantly, the Judge allowed bias and prejudice to influence his decision in the courtroom on 8/23/19 when he stated from his bench in open court : *"I am told to enter this order today; I will enter this order today."* This statement in open court from the bench proves violation of 18 USC Section 241 Conspiracy against Right and 18 USC Section 242 Deprivation of Right Under Color of Law by breaching duty and breaching peace, and injured my legal right and protections, maliciously harassed me, subjected me to a litany of additional filings, imposed compounded physical pain and financial injury, to cover up offences of RICO racket only, verifying influence over duty.

All the above clearly proves with supporting evidence that I am entitled to all relief sought. Each defendant was involved and participated by willfully conspiring to create orders causing me harm by corroding my rights and privileges by their misconduct breaching their duty towards me unrepresented to protect my legal rights and privileges. If any one of them or their family or friends were in my place, none would allow the treatment to them, proving equal application of law and basic human decency was eliminated due to egregious bias and desperation to cover up serious RICO related offences. This court entered an order on 7/12/21 (attached) confirming obligations and unalienable rights and privileges I have in this regard.

The statements foregoing are true, and not filed for an improper purpose.

Respectfully submitted on 8/24/21 by Promila Rajput

Promila Rajput, self-represented
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